

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION

STATE OF LOUISIANA, *et al.*,

*Plaintiffs,*

v.

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION

*Defendant.*

Case No. 2:24-cv-629-DCJ-TPL

UNITED STATES CONFERENCE OF  
CATHOLIC BISHOPS; THE SOCIETY OF  
THE ROMAN CATHOLIC CHURCH OF  
THE DIOCESE OF LAKE CHARLES; THE  
SOCIETY OF THE ROMAN CATHOLIC  
CHURCH OF THE DIOCESE OF  
LAFAYETTE; THE CATHOLIC  
UNIVERSITY OF AMERICA,

*Plaintiffs,*

v.

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION

*Defendant.*

Case No. 2:24-cv-691-DCJ-TPL

**UNOPPOSED MOTION OF SMALL BUSINESS MAJORITY, MAIN STREET  
ALLIANCE, AND AMERICAN SUSTAINABLE BUSINESS COUNCIL FOR LEAVE TO  
FILE BRIEF OF AMICI CURIAE**

Proposed *Amici* are the Small Business Majority, Main Street Alliance, and American Sustainable Business Council (collectively “Proposed *Amici*”). Proposed *Amici* respectfully move

for leave to file the attached *amicus* brief in opposition to the State Plaintiffs’<sup>1</sup> Motion for Summary Judgment, in opposition to the Bishop Plaintiffs’<sup>2</sup> Motion for Partial Summary Judgment and Permanent Injunction, and in Support of Defendant Equal Opportunity Commissions’ Motion to Dismiss. Proposed *Amici* have contacted the parties for their positions and have been informed that the State Plaintiffs consent to this motion, the Bishop Plaintiffs do not oppose this motion, and Defendant consents to this motion. The proposed brief is attached to the memorandum in support as Exhibit A. An identical version of this *amicus* brief is being filed concurrently in both *Louisiana, et al. v. EEOC*, Case No 2:24-cv-00629 and *United States Conference of Catholic Bishops, et al. v. EEOC*, Case No. 2:24-cv-691-DCJ-TPL which have been consolidated for purposes of discovery and pre-trial motions practice. *See* No. 2:24-cv-629, ECF No. 49; 2:24-cv-00691, ECF No. 57.

For the reasons set forth in the accompanying memorandum, Proposed *Amici* seek leave to file their proposed brief.

Dated: November 19, 2024

Respectfully submitted,

/s/ William Most

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DEMOCRACY FORWARD

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<sup>1</sup> The State Plaintiffs are Louisiana and Mississippi.

<sup>2</sup> The Bishop Plaintiffs are U.S. Conference of Catholic Bishops, The Society of the Roman Catholic Church of the Diocese of Lake Charles, The Society of the Roman Catholic Church of the Diocese of Lafayette, and The Catholic University of America.

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